

LOCCKE, CORREIA,  
& BUKOSKY  
Michael A. Bukosky, Esq. (2293)  
24 Salem Street  
Hackensack, New Jersey 07601  
(201) 488-0880  
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

ANTHONY CONDORELLI, and all  
persons similarly

Plaintiffs,

TOWNSHIP OF VERONA, a  
political subdivision of the  
State of New Jersey,

Defendant.

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: Docket No.  
: Civ. Action No.:  
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COMPLAINT

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Plaintiffs, by their attorneys, Loccke, Correia, &  
Bukosky, complaining of Defendant, respectfully allege as  
follows:

**JURISDICTION AND VENUE**

1. Plaintiffs bring this action to recover unpaid  
compensation and other relief under the provisions of the Fair  
Labor Standards Act of 1938, as amended [29 U.S.C. § 201-219;  
hereinafter the "Act" or the "FLSA"].

2. Jurisdiction of this action is conferred upon this  
Court by section 16(b) of the Act [29 U.S.C. § 216(b)] and by  
28 U.S.C. § 1337.

3. Venue of this action is established in this Court by section 16(b) of the Act [29 U.S.C. § 216(b)] and 28 U.S.C. § 1391 (b).

**THE PARTIES and CLASS ACTION**

4. Plaintiffs are or were employees of the Defendant TOWNSHIP OF VERONA, NEW JERSEY.

5. Pursuant to section 16(b) of the Act, [29 U.S.C. § 216 (b)], Plaintiffs bring this action on behalf of themselves and other employees similarly situated to themselves as described in the claim set forth herein.

6. The Defendant in this action is the TOWNSHIP OF VERONA, NEW JERSEY, and has a place of business at 600 Bloomfield Avenue, Verona , where Plaintiffs are or were employed.

7. Pursuant to section 16(b) of the Act [29 U.S.C. § 216 (b)], the named Plaintiffs herein have executed and filed with the Court their original consents in writing to become party Plaintiffs in this action. Should additional Plaintiffs similarly situated join this action, their consents will be filed with the Court.

8. The Plaintiffs are or were employees who are or were

at all relevant times employed in an enterprise engaged in commerce or in the production of goods for commerce, as defined by section 3(s) of the Act [29 U.S.C. § 203(s)]. More specifically, each Plaintiff is or was a police officer employed by the Defendant.

9. At all relevant times herein, the Plaintiffs have been entitled to the rights, protections, and benefits provided by the Fair Labor Standards Act, or "FLSA."

10. The Defendant Township of Verona, New Jersey, is an employer as defined by section 3(d) of the Act [29 U.S.C. § 203(d)] and a "public agency" within 29 U.S.C. § 203(x). Upon information and belief, the Defendant at all relevant times has been aware of the provisions of the FLSA, as amended, 29 U.S.C. § 201 *et seq.*

11. The Defendant is an enterprise, as defined by section 3(r) of the Act [29 U.S.C. § 203(r)].

#### **RELEVANT FACTUAL AVERMENTS**

12. Plaintiff and Defendant are parties to a series of collective bargaining agreements, the most recent one has a term of January 1, 2014 through December 31, 2016.

13. Section 5 of Article VII of the collective bargaining agreement states that "Each December 1, accumulated Time Compensated (T.C.) for each Officer shall be reduced by eight (8) hours.

14. Section 8 of Article VII of the collective bargaining agreement states that overtime shall be paid for work prescribed in this Article except under the following special circumstances:

Uniform Fittings

Voluntary Medical Examinations

Departmental Hearings (if the employee is found guilty)

15. Section 9 of Article VII of the collective bargaining agreement states that "[i]n the event an Officer incurs departmental overtime, the Officer may elect to take said overtime either in monetary compensation or in Time Compensated (T.C.). In any event, said overtime will be compensated at the rate of time and one-half (1 ½) of the Officer's rate of pay. Should the Officer elect to take compensation in the form of T.C., it must be noted on the Officer's time card at the time said overtime is incurred.

16. On or about November 11, 2014, the Plaintiffs, through their collective bargaining representative, the Policemen's Benevolent Association Local No. 72, advised an

agent for Defendant that the unilateral reduction of eight compensatory hours from each officer's compensatory time bank was a violation of the Act.

17. It is the policy of the Township to pay for Police Traffic Directors for private contractors as follows:

The Township will pay the Contractor up to 16 Man-Hrs for Police Traffic Directors, in accordance with the unit price contained in the Proposal. Any time over 16 Man-Hrs for Police Traffic Directors will be provided by the Township. All hours for Police Traffic Directors must be approved by the Township Engineer and Police Chief prior to being scheduled. No additional compensation will be made to the contractor for any Police Traffic Directors over 16 Man-Hrs.

18. The Defendant, by policy, has been assigning officers to provide police services as Traffic Directors to assist in the security of road repairs, utilities companies, etc.

19. The Defendant has failed to compute work performed as Police Traffic Directors for the Township of Verona into the Plaintiff's hours of work.

20. The Defendant has failed to compensate officers either straight-time at the officer's regular rate of pay or overtime pay for work performed as Police Traffic Directors for the Township of Verona.

**CLAIM FOR RELIEF (ON BEHALF OF ALL PLAINTIFFS)**

**COUNT I**

**(UNILATERAL REDUCTION OF COMPENSATORY TIME)**

21. Plaintiffs hereby repeat, re-allege and fully incorporate all facts set forth in Paragraphs 1 through 20.

22. Section 207(o) of the Act permits government employers to pay some FLSA overtime with compensatory time off instead of cash, at a rate of one and one-half hours per overtime hour worked.

23. Under the Act, employees must be permitted to use accrued compensatory time.

24. Section 207 (o)(3)(A) allows law enforcement officers to accrue or maintain "in the bank" a maximum of 480 hours of compensatory time at any time.

25. Overtime worked in excess of these maximum "caps" must be paid in cash.

26. Under the Act, there can be no "use it or lose it" restriction for FLSA compensatory time.

27. The Defendants have, during the applicable statutory maximum time period unilaterally deducted eight hours of compensatory time from officers' compensatory time bank without providing time or cash value for such hours.

28. The actions of the Defendant in unilaterally deducting eight hours of compensatory time from officers' compensatory time bank without providing time or cash value for such hours is a violation of the Act, 29 U.S.C. § 201, et seq. Such violation is redressable by the Plaintiffs as affected employees under Section 16 (b) of the Act [29 U.S.C. §216 (b)].

29. Defendant, therefore, is liable to the Plaintiffs herein in the amount of Plaintiff's unpaid compensation and additional amount as liquidated damages, and for reasonable attorney's fees, together with the costs and disbursements of this action.

**COUNT II**

**(FAILURE TO PROPERLY CALCULATE COMPENSABLE TIME WORKED)**

30. Plaintiffs hereby repeat, re-allege and fully incorporate all facts set forth in Paragraphs 1 through 29.

31. Employees covered under the Act are entitled to compensation for all hours of work which an employee is on duty on the employer's premises or at a prescribed workplace, as well as all other time during which the employee is suffered or permitted to work for the employer. [20 C.F.R. §551.221].

32. The employer has failed to count work performed as Police Traffic Directors, or similar construction site patrol activity into the total work week in violation of the Act.

33. The employer has failed to pay straight time pay at the officers regular rate of pay to officers who performed duties as Police Traffic Directors or similar construction site patrol activity in violation of the Act.

34. The employer has failed to count work performed as Police Traffic Directors to compute overtime pay in violation of the Act.



35. The actions of the Defendant in failing to aggregate all time worked by officers is a violation of the Act, 29 U.S.C. § 201, et seq. Such violation is redressable by the Plaintiffs as affected employees under Section 16 (b) of the Act [29 U.S.C. §216 (b)].

36. Defendant, therefore, is liable to the Plaintiffs herein in the amount of Plaintiff's unpaid compensation and additional amount as liquidated damages, and for reasonable attorney's fees, together with the costs and disbursements of this action.

#### **STATUTE OF LIMITATIONS**

37. On information and belief, the failure of Defendant to compensate Plaintiffs as required by the FLSA in each of the claims set forth in this complaint was a knowing, willful and/or reckless violation of section 7 of the Fair Labor Standards Act [29 U.S.C. § 207] within the meaning of the applicable statute of limitations [29 U.S.C. § 255 (a)]. To the extent any of the Plaintiffs' claims fall within the statute of limitations period, Defendant is liable for back pay, liquidated damages, attorney's fees and costs and disbursements of this action.

**RECORDS**

38. The employment and work records for Plaintiffs are in the exclusive possession, custody and control of the Defendant, and Plaintiffs are unable to state precisely at this time the amounts owing to them without access to and examination of the records. The Defendant is under a duty imposed by 29 U.S.C. section 211 (c) and the regulations of the United States Department of Labor to maintain and preserve payroll and other employment records with respect to Plaintiffs from which some of the amounts of Defendant's liability can be ascertained.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs herein request from the Court the following relief:

(a) An order for a complete and accurate accounting of all the compensation to which the Plaintiffs are entitled;

(b) Judgment against the Defendant awarding each Plaintiff monetary damages in the form of back pay compensation, liquidated damages equal to their unpaid wages, plus appropriate pre-judgment and post-judgment interest;

(c) Reasonable attorney's fees; and

(d) The costs and disbursements of this action together with such other and further relief as the Court deems proper.

By:  (MAB2293)

Michael A. Bukosky, Esq.

Loccke, Correia & Bukosky

DATED: November 25, 2014

LOCCKE, CORREIA,  
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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

ANTHONY CONDORELLI, and all  
persons similarly situated

Plaintiffs,

v.

TOWNSHIP OF VERONA,  
a political subdivision of the  
State of New Jersey,

Defendant.

Docket No.:

NOTICE OF CONSENT TO BE  
PARTY TO SUIT

I, John Lecreux, hereby consent to become a party to  
(print name)  
the above referenced Fair Labor Standards Action concerning the  
improper reduction of compensatory time and failure to properly  
calculate work time pursuant to 29 U.S.C. § 216 (b) and thereby  
consent to PBA Representative Anthony Condorelli, to bring such  
action on my behalf.

SIGNATURE

DATE

11/24/14

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State of New Jersey,	:	
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Defendant.	:	

I, Joseph N Ballatyre, hereby consent to become a party to  
(print name)  
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consent to PBA Representative Anthony Condorelli, to bring such  
action on my behalf.

Joseph N Ballatyre  
SIGNATURE

11/19/14  
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Defendant.	:	
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I, DANIEL GRECO, hereby consent to become a party to  
(print name)  
the above referenced Fair Labor Standards Action concerning the  
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Defendant.	:	
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I, Richard Page Persch, hereby consent to become a party to  
 (print name)  
 the above referenced Fair Labor Standards Action concerning the  
 improper reduction of compensatory time and failure to properly  
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 consent to PBA Representative Anthony Condorelli, to bring such  
 action on my behalf.

Richard Page Persch  
 SIGNATURE

11/17/14  
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Defendant.	:	
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I, Mitchell Stern, hereby consent to become a party to  
(print name)  
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consent to PBA Representative Anthony Condorelli, to bring such  
action on my behalf.

  
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I, Timothy Banta, hereby consent to become a party to  
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consent to PBA Representative Anthony Condorelli, to bring such  
action on my behalf.

OL Banta  
SIGNATURE

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I, Anthony Condorelli, hereby consent to become a party to  
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Defendant.	:	

I, William S. FRAZEE, hereby consent to become a party to  
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I, RON THORWARD, hereby consent to become a party to  
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Defendant.	:	
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I, Alyssa Kirby, hereby consent to become a party to  
(print name)  
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I, GERARD M. BARONE, hereby consent to become a party to  
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\_\_\_\_\_  
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I, Michael G. Harrington, hereby consent to become a party to  
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action on my behalf.

Michael G. Harrington  
SIGNATURE

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I, EDWARD H. RUFF, hereby consent to become a party to  
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I, Anthony O'Conner, hereby consent to become a party to  
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I, JOHN CHRISTOPHER KIERNAN hereby consent to become a party to  
(print name)  
the above referenced Fair Labor Standards Action concerning the  
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I, MICHAEL TRATTINO, hereby consent to become a party to  
(print name)  
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I, Paul D. Watkins Jr., hereby consent to become a party to  
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LOCCKE, CORREIA,  
LIMSKY & BUKOSKY  
Marcia J. Tapia-Mitolo, Esq. (1732)  
24 Salem Street  
Hackensack, New Jersey 07601  
(201)488-0880  
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

ANTHONY CONDORELLI, and all	:	
persons similarly situated	:	Docket No.:
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
TOWNSHIP OF VERONA,	:	NOTICE OF CONSENT TO BE
a political subdivision of the	:	PARTY TO SUIT
State of New Jersey,	:	
	:	
Defendant.	:	

I, Chris Schepers, hereby consent to become a party to  
(print name)  
the above referenced Fair Labor Standards Action concerning the  
improper reduction of compensatory time and failure to properly  
calculate work time pursuant to 29 U.S.C. § 216 (b) and thereby  
consent to PBA Representative Anthony Condorelli, to bring such  
action on my behalf.

  
SIGNATURE

11/17/14  
DATE

LOCCKE, CORREIA,  
LIMSKY & BUKOSKY  
Marcia J. Tapia-Mitolo, Esq. (1732)  
24 Salem Street  
Hackensack, New Jersey 07601  
(201)488-0880  
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

ANTHONY CONDORELLI, and all	:	
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Plaintiffs,	:	
	:	
v.	:	
	:	
TOWNSHIP OF VERONA,	:	NOTICE OF CONSENT TO BE
a political subdivision of the	:	PARTY TO SUIT
State of New Jersey,	:	
	:	
Defendant.	:	

I, Thomas J. Conroy III, hereby consent to become a party to  
(print name)  
the above referenced Fair Labor Standards Action concerning the  
improper reduction of compensatory time and failure to properly  
calculate work time pursuant to 29 U.S.C. § 216 (b) and thereby  
consent to PBA Representative Anthony Condorelli, to bring such  
action on my behalf.

  
SIGNATURE

11/17/2014  
DATE

LOCCKE, CORREIA,  
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(201)488-0880  
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

ANTHONY CONDORELLI, and all	:	
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Plaintiffs,	:	
	:	
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	:	
TOWNSHIP OF VERONA,	:	NOTICE OF CONSENT TO BE
a political subdivision of the	:	PARTY TO SUIT
State of New Jersey,	:	
	:	
Defendant.	:	
	:	

I, DAVID WAROROE, hereby consent to become a party to  
(print name)  
the above referenced Fair Labor Standards Action concerning the  
improper reduction of compensatory time and failure to properly  
calculate work time pursuant to 29 U.S.C. § 216 (b) and thereby  
consent to PBA Representative Anthony Condorelli, to bring such  
action on my behalf.

David Waroroe  
SIGNATURE

11/17/2014  
DATE

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Marcia J. Tapia-Mitolo, Esq. (1732)  
24 Salem Street  
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(201)488-0880  
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

ANTHONY CONDORELLI, and all	:	
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Plaintiffs,	:	
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v.	:	
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TOWNSHIP OF VERONA,	:	NOTICE OF CONSENT TO BE
a political subdivision of the	:	PARTY TO SUIT
State of New Jersey,	:	
	:	
Defendant.	:	
	:	

I, Michael Roglio, hereby consent to become a party to  
(print name)  
the above referenced Fair Labor Standards Action concerning the  
improper reduction of compensatory time and failure to properly  
calculate work time pursuant to 29 U.S.C. § 216 (b) and thereby  
consent to PBA Representative Anthony Condorelli, to bring such  
action on my behalf.

Michael Roglio  
SIGNATURE

11/18/14  
DATE



LOCCKE, CORREIA,  
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Marcia J. Tapia-Mitolo, Esq. (1732)  
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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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Plaintiffs,	:	
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v.	:	
	:	
TOWNSHIP OF VERONA,	:	NOTICE OF CONSENT TO BE
a political subdivision of the	:	PARTY TO SUIT
State of New Jersey,	:	
	:	
Defendant.	:	

I, Joel Martin, hereby consent to become a party to  
(print name)  
the above referenced Fair Labor Standards Action concerning the  
improper reduction of compensatory time and failure to properly  
calculate work time pursuant to 29 U.S.C. § 216 (b) and thereby  
consent to PBA Representative Anthony Condorelli, to bring such  
action on my behalf.

Joel Martin  
SIGNATURE

11/18/14  
DATE

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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persons similarly situated	:	Docket No.:
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Plaintiffs,	:	
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	:	
TOWNSHIP OF VERONA,	:	NOTICE OF CONSENT TO BE
a political subdivision of the	:	PARTY TO SUIT
State of New Jersey,	:	
	:	
Defendant.	:	
	:	

I, Robert Shafer, hereby consent to become a party to  
(print name)  
the above referenced Fair Labor Standards Action concerning the  
improper reduction of compensatory time and failure to properly  
calculate work time pursuant to 29 U.S.C. § 216 (b) and thereby  
consent to PBA Representative Anthony Condorelli, to bring such  
action on my behalf.

Robert Shafer  
SIGNATURE

11/18/2014  
DATE

LOCCKE, CORREIA,  
LIMSKY & BUKOSKY  
Marcia J. Tapia-Mitolo, Esq. (1732)  
24 Salem Street  
Hackensack, New Jersey 07601  
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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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persons similarly situated	:	Docket No.:
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Plaintiffs,	:	
	:	
v.	:	
	:	
TOWNSHIP OF VERONA,	:	NOTICE OF CONSENT TO BE
a political subdivision of the	:	PARTY TO SUIT
State of New Jersey,	:	
	:	
Defendant.	:	

I, ERIN MCGARITY, hereby consent to become a party to  
(print name)  
the above referenced Fair Labor Standards Action concerning the  
improper reduction of compensatory time and failure to properly  
calculate work time pursuant to 29 U.S.C. § 216 (b) and thereby  
consent to PBA Representative Anthony Condorelli, to bring such  
action on my behalf.

EM  
SIGNATURE

11/19/14  
DATE

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24 Salem Street  
Hackensack, New Jersey 07601  
(201) 488-0880  
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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Plaintiffs,	:	
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v.	:	
	:	
TOWNSHIP OF VERONA,	:	NOTICE OF CONSENT TO BE
a political subdivision of the	:	PARTY TO SUIT
State of New Jersey,	:	
	:	
Defendant.	:	
	:	

I, STEPHEN A. DEBOE, hereby consent to become a party to  
(print name)  
the above referenced Fair Labor Standards Action concerning the  
improper reduction of compensatory time and failure to properly  
calculate work time pursuant to 29 U.S.C. § 216 (b) and thereby  
consent to PBA Representative Anthony Condorelli, to bring such  
action on my behalf.

SA A  
SIGNATURE

11/19/2014  
DATE

LOCCKE, CORREIA,  
LIMSKY & BUKOSKY  
Marcia J. Tapia-Mitolo, Esq. (1732)  
24 Salem Street  
Hackensack, New Jersey 07601  
(201) 488-0880  
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

ANTHONY CONDORELLI, and all	:	
persons similarly situated	:	Docket No.:
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Plaintiffs,	:	
	:	
v.	:	
	:	
TOWNSHIP OF VERONA,	:	NOTICE OF CONSENT TO BE
a political subdivision of the	:	PARTY TO SUIT
State of New Jersey,	:	
	:	
Defendant.	:	
	:	

I, STEVEN J. YOUNG, hereby consent to become a party to  
(print name)  
the above referenced Fair Labor Standards Action concerning the  
improper reduction of compensatory time and failure to properly  
calculate work time pursuant to 29 U.S.C. § 216 (b) and thereby  
consent to PBA Representative Anthony Condorelli, to bring such  
action on my behalf.

AY  
SIGNATURE

11/19/2014  
DATE



LOCCKE, CORREIA,  
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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

ANTHONY CONDORELLI, and all	:	
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Plaintiffs,	:	
	:	
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	:	
TOWNSHIP OF VERONA,	:	NOTICE OF CONSENT TO BE
a political subdivision of the	:	PARTY TO SUIT
State of New Jersey,	:	
	:	
Defendant.	:	
	:	

I, Horiberto Caratini Jr. hereby consent to become a party to  
(print name)  
the above referenced Fair Labor Standards Action concerning the  
improper reduction of compensatory time and failure to properly  
calculate work time pursuant to 29 U.S.C. § 216 (b) and thereby  
consent to PBA Representative Anthony Condorelli, to bring such  
action on my behalf.

  
SIGNATURE

11-20-14  
DATE

LOCCKE, CORREIA,  
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Marcia J. Tapia-Mitolo, Esq. (1732)  
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(201) 488-0880  
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

ANTHONY CONDORELLI, and all	:	
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Plaintiffs,	:	
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TOWNSHIP OF VERONA,	:	NOTICE OF CONSENT TO BE
a political subdivision of the	:	PARTY TO SUIT
State of New Jersey,	:	
	:	
Defendant.	:	
	:	

I, James B Huber, hereby consent to become a party to  
(print name)  
the above referenced Fair Labor Standards Action concerning the  
improper reduction of compensatory time and failure to properly  
calculate work time pursuant to 29 U.S.C. § 216 (b) and thereby  
consent to PBA Representative Anthony Condorelli, to bring such  
action on my behalf.

  
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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
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ANTHONY CONDORELLI, and all	:	
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Plaintiffs,	:	
	:	
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	:	
TOWNSHIP OF VERONA,	:	NOTICE OF CONSENT TO BE
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State of New Jersey,	:	
	:	
Defendant.	:	

I, JAMES V. BARRY JR., hereby consent to become a party to  
(print name)  
the above referenced Fair Labor Standards Action concerning the  
improper reduction of compensatory time and failure to properly  
calculate work time pursuant to 29 U.S.C. § 216 (b) and thereby  
consent to PBA Representative Anthony Condorelli, to bring such  
action on my behalf.

  
SIGNATURE

11-21-14  
DATE